

**FILED**

DEC 09 2016

Clerk, U.S. District Court  
Texas Eastern

General Complaint

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS

Grover Glatfelter

Case Number :

4:16cv938  
Mazzant/Johnson

List the full name of each plaintiff in this action.

VS.

1. City of Paris
2. Paris Economic Development Corporation

List the full name of each defendant in this action.  
Do not use "et al".

Attach additional pages if necessary.

I. ATTEMPT TO SECURE COUNSEL:

Please answer the following concerning your attempt to secure counsel.

- A. In the preparation of this suit, I have attempted to secure the aid of an attorney as follows: (circle one)

1. Employ Counsel
2. Court - Appointed Counsel
3. Lawyer Referral Service of the State Bar of Texas,  
P. O. Box 12487, Austin, Texas 78711.

- B. List the name(s) and address(es) of the attorney(s):

Due to small area, I was unable to find  
lawyer to help me...

C. Results of the conference with counsel:

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II. List previous lawsuits:

A. Have you filed other lawsuits in state or federal court dealing with the same facts involved in this action or any other incidents? \_\_\_\_\_ Yes ☒ No

B. If your answer to "A" is "yes", describe the lawsuit in the space below. If there is more than one lawsuit, attach a separate piece of paper describing each.

1. Approximate file date of lawsuit: \_\_\_\_\_

2. Parties to previous lawsuit(s):

Plaintiff \_\_\_\_\_

Defendant \_\_\_\_\_

Attach a separate piece of paper for additional plaintiffs or defendants.

3. Identify the court the lawsuit was filed. If federal, name the district. If state, name the county.

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4. Docket number in other court. \_\_\_\_\_

5. Name of judge to whom the case was assigned.

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6. Disposition: Was the case dismissed, appealed or still pending?

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7. Approximate date of disposition. \_\_\_\_\_

III. Parties to this suit:

A. List the full name and address of each plaintiff:

Pla #1

Grover Allen Glatfelter  
1345 S.E. 6th street, Paris Texas 75460  
903-495-4473

Pla #2

B. List the full name of each defendant, their official position, place of employment and full mailing address.

Dft #1:

City of Paris Texas

Dft #2:

Paris Economic Development Corp  
Benham street, Paris Texas

Dft #3

Attach a separate sheet for additional parties.

## IV: Statement of Claim:

State as briefly as possible the fact of your case. Describe how each defendant is involved. Include the names of other persons involved with dates and places. Do not give any legal arguments or cite cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Use as much space as you need, attaching additional pages if necessary.

DeFenbaugh & Associates Inc (214-944-1417) Was employed by  
 PEAC to do "Forensic" Audit... A recommendation was made  
 to get F.B.I. involved in criminal case... After 1.9 Million  
 dollars was found to be unaccounted for; additionally  
 credit cards were abused by director + assistant (offsite)  
 The city of Paris feels it's "time to move on"  
 as if nothing has happened... Certain families in  
 Paris were named in financial audit as having influenced  
 money spent + at one point Mayor Hushmi was told  
 his political career was "on the line" if certain  
 things were not done as a favor to certain individuals...  
 Paris Economic Development Corp... Has used  
 intimidation tactics to individuals who have questioned  
 them about Recovering Monies...  
 Both entities have obstructed justice + have failed  
 in their fiduciary responsibilities... Much of this money  
 came from R3BIF (U.S.D.A.) Grants + other Federal  
 monies



- V. Relief: State Briefly exactly what you want the court to do for you. Make no legal arguments and do not cite cases or statutes. Attach additional pages if necessary.

Court supervised recovery of lost monies &  
Investigation of people who may be at fault  
Return of money to city of Paris Texas &  
Criminal prosecution if necessary...  
Would request Writ of Mandamus  
Notification to U.S.D.A. of R3BI abuse's

Signed this Ninth day of December, 20 16.  
(Month) (Year)

Grover Allen Glatfelter  
1345 S.E. 6th street  
Paris Tx 75460  
903-495-4473

I declare (certify, verify or state) under penalty of perjury that the foregoing is true and correct.

Executed on: December 09, 2016  
Date

Grover Allen Glatfelter

Signature of each plaintiff